## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA

CIVIL ACTION NO.: 3:20-CV-00620-RJC-DSC

KEVIN FONSECA,	)
Plaintiff,	) )
vs.	PROTECTIVE ORDER PURSUANT TO FRE 502(d)
AMERICAN NATIONAL RED CROSS,	, )
Defendant.	) ) )

Defendant has moved the Court pursuant to Rule 502(d) of the Federal Rules of Evidence, as well as Local Rule 7.1, for entry of a Protective Order pursuant to Rule 502(d) concerning the production of privileged or work-product protected documents and information.

## UPON GOOD CAUSE SHOWN, IT IS HEREBY ORDERED THAT:

- 1. The production of privileged or work-product protected documents, electronically stored information ("ESI") or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal, state, or administrative proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
- 2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

SO ORDERED.

Signed: December 2, 2021

David S. Cayer